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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

JOHN R. JAMISON,

Case No. 3-03-01036-KI (Lead Case)

Plaintiff(s),

v.

OLIN CORPORATION-WINCHESTER  
DIVISION; U.S. REPEATING ARMS  
CO., INC.; BROWNING; BROWNING  
ARMS CO.; and G.I. JOE'S, INC.,

**PLAINTIFF'S REQUESTED JURY  
QUESTIONNAIRE**

Defendants.

Plaintiff requests that the Court administer the Jury Questionnaire attached hereto to the potential jurors in the above-captioned case.

Dated this 24th day of October, 2005.

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

By: 

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-and-

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## **JURY QUESTIONNAIRE**

### **INTRODUCTION AND INSTRUCTIONS**

Thank you for coming to court as a potential juror. Before the case can start, a jury must be selected. The judge and the people involved in the case need to know something about you in order to select jurors who can be fair to both sides.

Everyone has attitudes and opinions that are shaped by their life experiences. Sometimes these experiences can make it difficult to look at a certain issue in an unbiased and unemotional way. As a juror, you must return a verdict based on the law and on the facts presented in court, not on emotion or on other views not supported by the evidence. The judge will give you instructions on the law and on how you should go about deciding the case. You must listen to and follow the judge's instructions.

The questions on this form are designed to help the court and the lawyers learn something about your background and your views on issues that may be related to this case. There are no right or wrong answers. The questions are asked not to invade your privacy, but to make sure that you can be a fair and impartial juror. If there is any reason why you might not be able to give both sides a fair trial in this case, it is important that you say so.

The judge has decided to use this form to save time and to give you a chance to tell the court and the lawyers about yourself. You should carefully read the questions and do your best to answer them in detail. Be sure to fill out all pages of the questionnaire. This form is to be answered individually and confidentially by every juror.

Do not write on the back of any page. If you need more space, use the explanation page at the end of this questionnaire. Please indicate the number of the question you are continuing on the explanation page.

Because the lawyers will use the questionnaires in the jury selection process, your answers to this questionnaire become a matter of public record, just as if you had answered the questions aloud in the courtroom. When we have finished with this trial, the questionnaire will be shredded.

Some of the items of this questionnaire are of a sensitive nature. If there is anything you do not want to talk about in open court, please circle the question number. After you have finished the questionnaire, let the clerk know that you have circled one or more question numbers.

If you have trouble reading, understanding, or filling out this form, please let the court clerk know.

**PLEASE REMEMBER THAT YOU ARE ANSWERING THESE QUESTIONS UNDER  
PENALTY OF PERJURY. YOUR ANSWERS MUST BE TRUE AND COMPLETE.  
THANK YOU FOR YOUR HELP IN SELECTING A FAIR JURY.**

Juror No. \_\_\_\_\_

**JUROR QUESTIONNAIRE**

1. Name: \_\_\_\_\_  
                     *Last*                                    *First*                                    *Middle Initial*
2. Gender:      ☐ Male      ☐ Female
3. Age: \_\_\_\_\_
4. What is your current marital status?
- ☐ Single (never married)      ☐ Divorced      ☐ Widowed  
     ☐ Married      ☐ Separated      ☐ Domestic Partnership
5. What county do you live in? \_\_\_\_\_ For how long? \_\_\_\_\_
6. What is the highest level of education you have completed?
- ☐ Less than High School      ☐ Some College  
     ☐ High School Graduate or GED      ☐ College Graduate (Major: \_\_\_\_\_)  
     ☐ Technical/Business School      ☐ Post Graduate Degree (Area: \_\_\_\_\_)
7. What do you consider to be your primary employment status? (Check only one)
- ☐ Employed full-time      ☐ Retired      ☐ Homemaker  
     ☐ Employed part-time      ☐ Disability      ☐ Temporarily laid off  
     ☐ Self-employed      ☐ Unemployed      ☐ Other: \_\_\_\_\_
8. Please list each of the jobs you have had in the past ten (10) years (including self-employment) beginning with your current or most recent employment. If retired, please list your last job.

Dates	Employer	Job Title	Duties

9. If applicable, what is your spouse or partner's highest level of education completed?
- ☐ Less than High School      ☐ Some College  
     ☐ High School Graduate or GED      ☐ College Graduate (Major: \_\_\_\_\_)  
     ☐ Technical/Business School      ☐ Post Graduate Degree (Area: \_\_\_\_\_)
10. Which of the following describes your spouse or partner's primary employment status?
- ☐ Employed full-time      ☐ Retired      ☐ Homemaker  
     ☐ Employed part-time      ☐ Disability      ☐ Temporarily laid off  
     ☐ Self-employed      ☐ Unemployed      ☐ Other: \_\_\_\_\_

Juror No. \_\_\_\_\_

11. Please list each of the jobs your spouse and/or former spouse has had in the past ten (10) years (including self-employment) beginning with current or most recent employment.

Dates	Employer	Job Title	Duties

12. Have you ever served on a jury before?

☐ Yes      ☐ No

If Yes, did you serve on:      ☐ Criminal case?      How many? \_\_\_\_\_  
    ☐ Civil case?      How many? \_\_\_\_\_

Have you ever served as Foreperson?      ☐ Yes      ☐ No

Did any of your juries reach a verdict?      ☐ Yes      ☐ No

13. Have you ("Self"), or has anyone close to you ("Other"), ever had any of the following experiences? Please check each item that applies, and explain on the lines provided below:

- |    | <u>Self</u>              | <u>Other</u>             |  |
|----|--------------------------|--------------------------|--|
| a. | <input type="checkbox"/> | <input type="checkbox"/> | Been a defendant in a lawsuit, or had a claim of any type filed against you?   |
| b. | <input type="checkbox"/> | <input type="checkbox"/> | Been a witness, expert, or played some other role in a lawsuit?  |
| c. | <input type="checkbox"/> | <input type="checkbox"/> | Belong to an organization that promotes an opinion of jury verdicts?   |
| d. | <input type="checkbox"/> | <input type="checkbox"/> | Have been injured or damaged in some way (i.e., financially damaged), but chose not to sue?  |
| e. | <input type="checkbox"/> | <input type="checkbox"/> | Has applied for and/or received a patent?  |
| f. | <input type="checkbox"/> | <input type="checkbox"/> | Has had a patent application rejected?   |
| g. | <input type="checkbox"/> | <input type="checkbox"/> | Is a current or past member of a gun or hunting advocacy organization (e.g., National Rifle Association—NRA, U.S. Sportsmen's Alliance, National Hunters Association, etc.)?                     |
| h. | <input type="checkbox"/> | <input type="checkbox"/> | Has or knows someone who has been injured or killed by a gun?  |
| i. | <input type="checkbox"/> | <input type="checkbox"/> | Hunts regularly?   |
| j. | <input type="checkbox"/> | <input type="checkbox"/> | Subscribes and/or reads hunting or gun magazines (e.g., <i>Guns &amp; Ammo</i> , <i>Gun World Magazine</i> , <i>Shooting Times</i> , <i>Big Game Journal</i> , <i>Field &amp; Stream</i> , etc.) |
| k. | <input type="checkbox"/> | <input type="checkbox"/> | Eats according to a Vegan diet?  |
| l. | <input type="checkbox"/> | <input type="checkbox"/> | Has been involved in a contract dispute?   |

Please explain any "Yes" answers from the previous question:

- a. \_\_\_\_\_  
 b. \_\_\_\_\_  
 c. \_\_\_\_\_

Juror No. \_\_\_\_\_

- d. \_\_\_\_\_  
 e. \_\_\_\_\_  
 f. \_\_\_\_\_  
 g. Organization: \_\_\_\_\_  
 h. \_\_\_\_\_  
 i. \_\_\_\_\_  
 j. Magazines: \_\_\_\_\_  
 k. \_\_\_\_\_  
 l. \_\_\_\_\_

14. Please read each of the following statements carefully. After each statement, please check the appropriate box that best represents your opinion on each statement below:

Statement	Strongly Agree	Somewhat Agree	Somewhat Disagree	Strongly Disagree
There are too many frivolous lawsuits today.				
I would hesitate to file a lawsuit even if I felt injured or harmed by another.				
Jury awards are far too high today.				
Even if I felt a case had merit, I would find it difficult to award a high damage award.				
I do not believe in the concept of punitive damages (a damage meant to punish).				
I am a strong believer in the 2 <sup>nd</sup> Amendment.				
I only vote for political candidates who support my views on gun ownership.				
There are far too many governmental regulations on the gun industry today.				
It should be illegal to own or manufacture a gun.				
Some products should not be patented because it is better if the technology is openly shared.				
Patents interfere with business competition.				
Patents are too easy to obtain.				
The patent office routinely makes mistakes.				

Juror No. \_\_\_\_\_

Statement	Strongly Agree	Somewhat Agree	Somewhat Disagree	Strongly Disagree
For a contract to be valid, it must be in writing.				

15. Have you ("Self"), or has anyone close to you ("Other"), ever had any education, training, or job-related experience that has taught you anything about any of the following fields? Please check each item that applies, and explain on the lines provided below.

- |    | <u>Self</u>              | <u>Other</u>             |   |
|----|--------------------------|--------------------------|---|
| a. | <input type="checkbox"/> | <input type="checkbox"/> | Law, the justice system, or the courts? |
| b. | <input type="checkbox"/> | <input type="checkbox"/> | Accounting, finance, bookkeeping?       |
| c. | <input type="checkbox"/> | <input type="checkbox"/> | Guns, ammunition, weaponry?             |
| d. | <input type="checkbox"/> | <input type="checkbox"/> | Hunting?                                |
| e. | <input type="checkbox"/> | <input type="checkbox"/> | Patent process, patent examiner?        |
| f. | <input type="checkbox"/> | <input type="checkbox"/> | Contracts: writing, enforcing?          |

Please explain any "Yes" answers above:

- a. \_\_\_\_\_
- b. \_\_\_\_\_
- c. \_\_\_\_\_
- d. \_\_\_\_\_
- e. \_\_\_\_\_
- f. \_\_\_\_\_

16. Do you own guns?

☐ Yes      ☐ No

If "Yes," please list the type or caliber and brand of each gun you own:

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_

17. Based on the case summary attached to this questionnaire, do you recall reading, seeing, or hearing anything about this case before coming to court today?

☐ Yes      ☐ No

If "Yes," please describe what you've read, seen, or heard about this case:

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

Juror No. \_\_\_\_\_

18. Have you discussed this case with anyone prior to today?

☐ Yes ☐ No

19. Attached hereto is a list of individuals and businesses that are involved in this case. Please circle the names of any people or businesses you know or have any association with, and explain the relationship in the space provided below.

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20. Do you have difficulty understanding, reading, or writing the English language?

☐ Yes ☐ No

If "Yes," please explain:

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21. Do you recognize or know any other juror who was called for possible service on this case?

☐ Yes ☐ No

If "Yes," who are those individuals and how do you know them?

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22. Do you know any reason, physical or otherwise, that would affect your ability to serve on a jury for two weeks?

☐ Yes ☐ No

If "Yes," please explain:

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☐ Yes ☐ No

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If you were unable to sufficiently answer any particular question in the spaces provided, please use this area to provide that additional information. Thank you very much for your cooperation.

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins or other markings on the paper.

Juror No. \_\_\_\_\_

**Under penalty of perjury, I swear or affirm that the answers provided here are truthful to the best of my knowledge.**

Dated the \_\_\_\_\_ day of \_\_\_\_\_, 2005

Signed: \_\_\_\_\_

Please print your name here: \_\_\_\_\_

**Plaintiff's Preliminary List of Possible Trial Participants and Related Companies**  
**(to be supplemented following defendants' disclosures of trial witnesses)**

**Attorneys**

1. Bruce Campbell
2. Timothy DeJong
3. Brett Foster
4. Grant Foster
5. Stephen Gay
6. William Geny
7. Timothy Getzoff
8. Robert Shlachter

**Law Firms**

1. Chernoff Vilhauer McClung & Stenzel, LLP
2. Cosgrave Vergeer & Kester, LLP
3. Husch & Eppenberger, LLC
4. Klarquist Sparkman, LLP
5. Kolisch Hartwell, PC
6. Stoll Stoll Berne Lokting & Shlachter, PC
7. Wiggin & Dana

**Companies**

1. Associated Metallurgists
2. ATK Ammunition Group
3. Barnes Bullets
4. Browning
5. Browning Arms Co.
6. Clymer Manufacturing Co.
7. CRA International
8. Dakota Arms, Inc.
9. Federal Cartridge Company
10. FTI Consulting
11. Hoffman Clark, LLC
12. HP White Laboratory, Inc.
13. Olin Corporation-Winchester Division
14. Packer Engineering, Inc.
15. Payne's Custom Gunsmithing
16. RCBS
17. Remington Arms Company, Inc.
18. Siskiyou Gun Works
19. Sturm Ruger & Co., Inc.
20. U.S. Repeating Arms Co., Inc.

**Witnesses**

1. Robert Block
2. Dr. Tage Carlson
3. Alan Corzine
4. Ward Dobler
5. Charles Patrick "CP" Donnelly
6. John M. Dwyer
7. Brad Elder
8. Charles Fagg
9. Susan Fishbein
10. Ken Green
11. Charles Guevremont
12. Lance Gunderson
13. Travis Hall
14. Marcus Heath
15. Peter Heuser
16. Mark Hoffman
17. Kevin Howard
18. Eva Jamison
19. John "Rick" Jamison
20. Tim Janzen
21. Michael Jordan
22. Gregory Kosteck
23. David Manson
24. Tom Miller
25. Kent Mundon
26. Rudolph Nedelka
27. Larry Nelson
28. Ralph Payne
29. Lester Roane
30. Joseph Rousseau
31. Robert Stutler
32. Dennis Veilleux
33. Jacob E. Vilhauer
34. Michael Wagner
35. Glen Weeks
36. Paul Weinstein
37. Dennis Wilcox
38. Bill Wiseman